

Amendments to the Drawing Figures:

The attached drawing sheet includes proposed changes to FIGs. 1 and 2 and replaces the original sheet including FIGs. 1 and 2.

Attachment: Replacement Sheet

REMARKS / DISCUSSION OF ISSUES

Claims 1-10 and 17-26 are pending in the application. Claims 17-26 are newly added.

The applicant thanks the Examiner for acknowledging the claim for priority and receipt of certified copies of all the priority document(s).

Claims are amended for non-statutory reasons: to correct one or more informalities, remove figure label number(s), and/or to replace European-style claim phraseology with American-style claim language. The claims are not narrowed in scope and no new matter is added.

New dependent claims are added to at least partially restore the original range of claims that existed before multiple dependencies were removed in the preliminary amendment. No new matter is added.

The applicant thanks the Examiner for providing information about recommended section headings. However, the applicant respectfully declines to add the headings. Section headings are not statutorily required for filing a non-provisional patent application under 35 USC 111(a), but are only guidelines that are suggested for applicant's use. (See Miscellaneous Changes in Patent Practice, Response to comments 17 and 18 (Official Gazette, August 13, 1996) [Docket No: 950620162-6014-02] RIN 0651-AA75 ("Section 1.77 is permissive rather than mandatory. ... [T]he Office will not require any application to comply with the format set forth in 1.77").

The Office action objects to the drawings; the drawings are correspondingly amended herein.

The Office action rejects claims 1-10 under 35 U.S.C. 102(b) over McCartney, Jr. (USP 5,311,337, hereinafter McCartney). The applicant respectfully traverses this rejection.

The Examiner's attention is requested to MPEP 2131, wherein it is stated:

"A claim is anticipated only if *each and every element* as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The *identical invention* must be shown in as *complete detail* as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

The Board of Patents Appeals and Interferences has consistently upheld the principle that the burden of establishing a prima facie case resides with the Office, and to meet this burden, the Examiner must specifically identify where each of the claimed elements are found in the prior art:

"there must be no difference between the claimed invention and the reference disclosure, as viewed by a person of ordinary skill in the field of the invention. *Scripps Clinic & Research Found. v. Genentech, Inc.*, 927 F.2d 1565, 1576, 18 USPQ2d 1001, 1010 (Fed. Cir. 1991). To meet [the] burden of establishing a prima facie case of anticipation, the examiner must explain how the rejected claims are anticipated by pointing out *where* all of the specific limitations recited in the rejected claims are found in the prior art relied upon in the rejection." *Ex Parte Naoya Isoda*, Appeal No. 2005-2289, Application 10/064,508 (BPAI Opinion October 2005).

Claim 1, upon which claims 2-10 depend, claims a display device that includes at least three row driver circuit portions and at least three column driver circuit portions disposed alternately around the outer periphery of an array of pixels.

McCartney does not teach a display device with at least three row driver circuit portions and at least three column driver circuit portions disposed alternately around the outer periphery of an array of pixels, and the Office action fails to identify where McCartney provides this teaching. Additionally, the Office action fails to show where McCartney teaches the elements of each of the applicant's dependent claims.

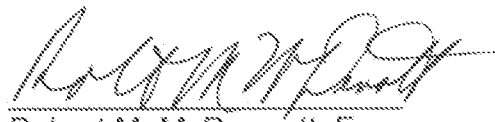
McCartney teaches a hexagonal arrangement of cells, with row electrodes extending across the array of hexagons in a horizontal direction, and column electrodes extending across the array of hexagons in a vertical direction. McCartney does not teach at least three portions of each of these horizontal and vertical electrodes being arranged alternately around the periphery of the array of pixels.

Each of McCartney's pixels can be reached by a single pair of row and column drivers, and McCartney does not teach or suggest a structure wherein the pixels can be reached by at least three portions of each of these horizontal and vertical electrodes being arranged alternately around the periphery of the array of pixels.

Because McCartney fails to teach a display device that includes at least three row driver circuit portions and at least three column driver circuit portions disposed alternately around the outer periphery of an array of pixels, as specifically claimed in claim 1, the applicant respectfully maintains that the rejection of claims 1-10 under 35 U.S.C. 102(b) over McCartney is unfounded, per MPEP 2131.

In view of the foregoing, the applicant respectfully requests that the Examiner withdraw the objection(s) and/or rejection(s) of record, allow all the pending claims, and find the application in condition for allowance. If any points remain in issue that may best be resolved through a personal or telephonic interview, the Examiner is respectfully requested to contact the undersigned at the telephone number listed below.

Respectfully submitted,



Robert M. McDermott, Esq.  
Reg. 41,508  
804-493-0707

**Please direct all correspondence to:**  
Corporate Counsel  
U.S. PHILIPS CORPORATION  
P.O. Box 3001  
Briarcliff Manor, NY 10510-8001